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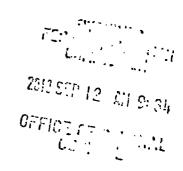
WITH PRIDE

NATIONAL
HEADQUARTERS
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Stewart M. Hickey National Executive Director

September 9, 2013

Ruth Heilizer, Esq. Federal Election Commission 999 E Street, N.W. Washington, DC 20463



MUR # 6754

Re: Complaint Against Velma Hart

Please accept this letter as a Complaint by AMVETS (American Veterans) against former employee Ms. Velma Hart, of , Upper Marlboro, Maryland 20774, for making federal PAC contributions using corporate funds.

AMVETS is a national veterans' service organization, Congressionally-chartered and tax-exempt under Section 501(c)(19) of the Internal Revenue Code. Ms. Velma Hart is a former employee of AMVETS, who held the position of National Finance Director, and was issued a corporate credit card. Ms. Hart's employment with AMVETS terminated on November 19, 2010.

In 2012, AMVETS engaged the firm of Tate & Tryon to conduct a review of specific elements of the AMVETS' financial statements for the 2010 fiscal year, and subsequently to examine corporate credit card charges by various AMVETS employees during the years 2006 – 2010. (Please see the full Tate & Tryon report, attached here as Exhibit A.) The examination revealed that Ms. Hart's credit card statements in particular contained a number of expenses lacking supporting documentation, as well as numerous instances of personal expenses charged to the corporate credit card by Ms. Hart. While AMVETS' records include copies of checks and deposit slips showing that Ms. Hart reimbursed AMVETS for some personal charges, in most instances no supporting documentation is included to tie the amounts of the reimbursement checks to specific expenditures identified as personal.

Of particular note, the examination revealed several federal PAC contributions made by Ms. Hart using her AMVETS corporate credit card. The internal AMVETS review found the following identified contributions to ASAE PAC on Ms. Hart's corporate credit card statements:

- 10/12/2005 \$50
- 11/13/2006 \$100
- 11/12/2008 \$100

- 3/31/2009 \$250
- 7/12/2009 \$250
- 12/12/2009 \$250
- 2/12/2010 \$250
- 10/12/2010 \$250

The eight contributions total \$1500 from 2005 through 2010, with six of the eight made within the last five years, totaling \$1350. Exhibit B attached includes a chart compiled by AMVETS during the course of the internal review, identifying the PAC contributions; the data above was taken from, and is reflected in, the chart. Exhibit B also includes documentation of all of the charges (except for the 3/31/2009 contribution), through credit card statements and copies of ASAE PAC contribution forms and receipts.

Because, as noted, Ms. Hart's corporate credit card charges included many personal charges, some but not all of which she reimbursed to AMVETS, but with insufficient documentation matching the reimbursements to specific charges (see, e.g., the November 2006 check and deposit ticket in Exhibit B), AMVETS inquired directly with Ms. Hart as to whether she had reimbursed AMVETS for the PAC contributions; Ms. Hart replied that she did not reimburse AMVETS for any of the contributions. The letter to Ms. Hart and her response are attached as Exhibit C.

Ms. Hart used her corporate credit card to make contributions to a federal PAC, using AMVETS' corporate funds in violation of federal law. Ms. Hart had actual notice that this was a violation of federal law, as demonstrated by the ASAE PAC contribution forms she signed (included in Exhibit B) which specifically state that "VOLUNTARY CONTRIBUTIONS BY INDIVIDUALS TO APAC SHOULD BE WRITTEN ON PERSONAL CHECKS OR MADE USING PERSONAL CREDIT CARD AND CANNOT BE REIMBURSED BY EMPLOYER....CONTRIBUTIONS FROM CORPORATIONS OR ASSOCIATIONS CANNOT BE ACCEPTED." AMVETS respectfully requests that the Commission investigate the matter and find Ms. Hart in violation of federal law for the reasons cited above.

Sincerely,

Stewart Hickey
Executive Director

AMVETS

4647 Forbes Blvd

Lanham, MD 20706

301-683-4004

Signed and sworn to before me this 97h day of 5eptember, 2013.

By Carol arm 7 udge

Notary Public